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May 24, 2024

**VIA ECF**

Honorable Jessica G. L. Clarke  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 20C  
New York, NY 10007

**Re: *Robert Hunter Biden v. Rudolph W. Giuliani, et al.*, Case No. 1:24-cv-2021 (JGLC)**

Dear Judge Clarke:

Pursuant to this Court's Order of April 16, 2024, the Parties in the above-captioned action submit this joint letter addressing "whether they would like to proceed before the Bankruptcy Court or whether the parties intend to file a stipulation of dismissal." (ECF No. 33.)

After communications between counsel and with their respective clients, the Parties intend to file a stipulation of dismissal of the action, without prejudice, and to toll the relevant statutes of limitations for the claims asserted in the action. The Parties anticipate finalizing their tolling agreement and filing a stipulation of dismissal without prejudice within the next ten (10) calendar days.

Respectfully submitted,

/s/ Abbe David Lowell

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